

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

ATTORNEYS AT LAW

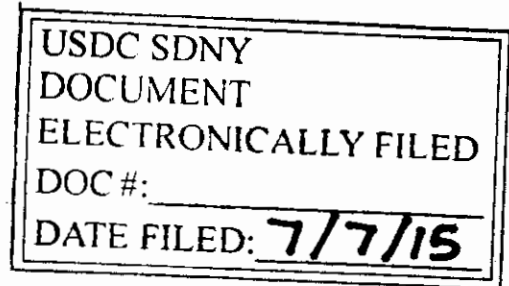
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July 6, 2015

**VIA ECF AND HAND DELIVERY**

Honorable Richard M. Berman  
U.S. District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 12D  
New York, NY 10007



Re: *BlackRock Balanced Capital Portfolio (FI), et al. v. Deutsche Bank National Trust Company, et al.*, No. 14-cv-9367-RMB  
*BlackRock Allocation Target Shares: Series S Portfolio, et al. v. Wells Fargo Bank National Association, et al.*, No. 14-cv-9371-RMB  
*Royal Park Investments SA/NV v. Wells Fargo Bank, N.A.*, No. 14-cv-9764-RMB  
*National Credit Union Administration Board, et al. v. Wells Fargo Bank, Nat'l Ass'n*, No. 14-cv-10067-RMB  
*Phoenix Light SF Ltd., et al. v. Wells Fargo Bank, N.A.*, No. 14-cv-10102-RMB

Dear Judge Berman:

On behalf of the parties in the above-referenced actions, we write to request that the Court (i) approve the parties' stipulation to extend the discovery cut-off for all actions; and (ii) continue the settlement status conference currently scheduled for July 13, 2015, at 10:00 a.m.

Pursuant to the Court's direction at the February 11, 2015 Case Management Conference, the parties have met and conferred and the parties stipulate, subject to the Court's approval, to extend the discovery cut-off date for all actions from July 13, 2015 to April 29, 2016. There have been no previous requests for extensions of the discovery cut-off date.

The parties further respectfully request the Court adjourn the settlement status conference scheduled for July 13, 2015, to a date of the Court's convenience following entry of an order on



BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Honorable Richard M. Berman  
July 6, 2015  
Page 2

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Defendants' pending joint motion to dismiss the complaints. There have been no previous requests for adjournment.

Respectfully submitted,



Timothy A. DeLange

cc: All Counsel of Record via ECF and email

<u>This application will be</u>	
<u>discussed at the 7/13/15</u>	
<u>Conference</u>	
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SO ORDERED:	
Date: <u>7/7/15</u>	<u>Richard M. Berman, U.S.D.J.</u>